

Message

From: Kelly, ThomasP [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=019A1B1BE25D409B83B845A84E0B0446-TKELLY]
Sent: 5/13/2019 5:42:25 PM
To: King, Scott@ARB [scott.king@arb.ca.gov]
Subject: FW: RACM Analysis for West Mojave Desert Stationary Sources
Attachments: Ventura-County AQMP - RACM.pdf

Carol Sutkus let me know I should work with you on a couple of issues with West Mojave Desert's attainment plan for the 2008 ozone NAAQS. One issue is the District's reasonably available control measure (RACM) analysis for District-controlled sources. I explain that further in the message below and gave Ventura as an example of how this could be done. The second issue I would like to cover with the District, and you, is contingency measures. We're speaking with all the districts about this.

I will let you have a little time to review this, then send you and Alan DeSalvio an email with possible time for a conference call in a few days. If you have any concerns or think I should go ahead a schedule a call, please contact me. Thanks.

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From: Kelly, ThomasP
Sent: Monday, March 18, 2019 4:04 PM
To: Sutkus, Carol@ARB <carol.sutkus@arb.ca.gov>
Cc: Lee, Anita <Lee.Anita@epa.gov>
Subject: RACM Analysis for West Mojave Desert Stationary Sources

I reviewed Appendix D-3, as you suggested. For stationary sources, It is essentially as statement that the Districts have determined they can't advance attainment by a year, without an explanation of the analysis that was completed. I have attached a discussion and analysis from the Ventura County ozone plan. Their analysis considered several specific rule revisions to support their determination -- that revising their rules could further reduce NOx by 0.08 tons per year and VOC by 0.25 tons per year. Such small reductions, however, would not advance attainment by a year (i.e. the RACM requirement). I am not certain Ventura's analysis even needed to consider Transportation Control Measures, because VCAQMD may not have the authority to implement or require them. You'll see a similar analysis in the ozone plans for South Coast, in Appendix VI-A (<https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-vi.pdf?sfvrsn=4>) and Sacramento, in Appendix E (the entire plan is at <http://www.airquality.org/ProgramCoordination/Documents/Sac%20Regional%202008%20NAAQS%20Attainment%20and%20RFP%20Plan.pdf>).

I am still interested in having a call with you and the District about RACM for their rules. If you still feel that Appendix D-3 is sufficient to meet the requirement, please let me know.

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